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Exhibit A

Proposed Order

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**ORDER DETERMINING
PROCEDURES FOR PRESERVING
JURY TRIAL RIGHTS**

1
2 Upon the Motion (the “**Motion**”), dated August 8, 2019,¹ of the TCC to determine the
3 procedures for individual tort claimants to preserve their jury trial rights; this Court having
4 jurisdiction to consider the Motion and relief requested therein pursuant to 28 U.S.C. §§ 157 and
5 1334, and the *Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges*, District
6 Court General Order 24, and Rule 5011-1(a) of the Bankruptcy Local Rules; and venue being
7 proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found and
8 determined that notice of the Motion as provided to the parties listed therein is reasonable and
9 sufficient under the circumstances, and it appearing that no other or further notice need be
10 provided; and this Court having reviewed the Motion; and upon consideration of the declaration
11 of Frank M. Pitre submitted in support of the Motion; and this Court having held a hearing on the
12 Motion; and this Court having determined that the legal and factual bases set forth in the Motion
13 establish just cause for the relief granted herein; and this Court having found and determined that
14 the relief sought in the Motion is in the best interests of the stakeholders of the Debtors, and after
15 due deliberation and sufficient cause appearing therefor:

16 **IT IS HEREBY ORDERED THAT:**

- 17 1. The Motion is GRANTED as provided herein.
- 18 2. Pursuant to Civil Rules 7 and 38, Bankruptcy Rule 9015, Bankruptcy Local Rule
19 9015-2(d), 28 U.S.C. §§ 157(b) and 1411(a) and 11 U.S.C. § 105(a):
- 20 a. A personal injury or wrongful death claimant against the Debtors does not
21 waive their right to a jury trial by (i) filing of a proof of claim in this
22 bankruptcy, or (ii) submitting information to the BrownGreer database
23 created as part of the Judicial Council Coordination Proceedings in state
24 court;
- 25 b. Any jury trial rights possessed by any creditor or purported creditor against
26 the Debtors (including, without limitation, the right to demand a jury trial
27 before a different court) are preserved. No jury demand or motion under
28

¹ Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Motion.

1 Local Rule 9015-2(d) is required until such time as the Court specifies in a
2 future Order, to be issued on or after the date the Court considers
3 confirmation of a plan of reorganization.

4 3. For the avoidance of doubt, this Order does not determine any party-in-interest's
5 rights to a jury trial against the Debtors. Nor does this Order prohibit a party-in-interest from
6 making a jury demand or filing a motion under Local Rule 9015-2(d) to protect its rights.

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8 **** END OF ORDER ****
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